

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
2000 SEP 14 P 4:00

ERIC V. BISHOP, SR., et al.,

Plaintiffs,

v.

PERDUE FARMS, INC.,

Defendant.

CLERK'S OFFICE
AT BALTIMORE

BY _____ DEPUTY

Civil Action No. WMN-00-CIV-1456

**DEFENDANT'S REPORT REGARDING
DEPOSITION HOURS**

COMES NOW Defendant and files its report with the Court regarding the number of deposition hours it anticipates in this case.

This is a class action collective action under the Fair Labor Standards Act (FLSA) and the Maryland Wage and Hour Act filed by a group of chicken catchers who have performed catching work for Perdue Farms. The named Plaintiffs seek to represent others similarly situated. They seek unpaid overtime pay, liquidated damages, and attorney's fees.

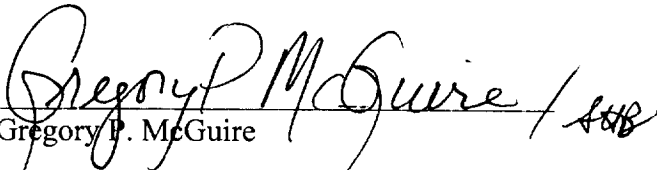
Defendant anticipates that it will need no more than one (1) hour of deposition time for each individual who files consents to join this action. Currently there are approximately 45

" APPROVED " 14th DAY
OF September 2000
W. M. Bishop
UNITED STATES DISTRICT COURT

individuals who have filed consents. Accordingly, at this time, Defendant believes it will need no more than fifty (50) hours of deposition time.¹

Dated this 21st day of August, 2000

HAYNSWORTH BALDWIN JOHNSON
& GREAVES LLC


Gregory P. McGuire

P.O. Box 10035
Raleigh, North Carolina 27605-0035
919.782.3340
919.782.3346 (Fax)

¹ Plaintiff's counsel has proposed to Defendant, and may include in her report on deposition hours, that Defendant can get information from the Plaintiffs by interrogatory. Defendant contends that it must have the opportunity to ask the individual Plaintiffs directly critical questions about the number of hours they worked, when their work started and ended, and other critical issues. Interrogatories also do not permit the type of follow up questioning that Defendant needs on these issues.

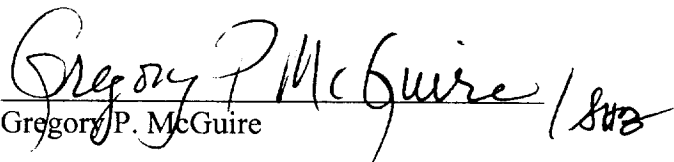
CERTIFICATE OF SERVICE

I, Gregory P. McGuire, do hereby certify that I have this day served a copy of Defendant's Report Regarding Deposition Hours upon all parties of record by placing a copy of the same in the United States mail, certified, return receipt requested, properly addressed and with the correct amount of postage affixed thereto:

Judith M. Conti, Esquire
JAMES & HOFFMAN
1146 19th Street N.W.
Washington, DC 20036

Dated this 21st day of August, 2000.

HAYNSWORTH BALDWIN JOHNSON
& GREAVES LLC


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